## EXHIBIT B

## UNITED STATES DISTRICT COURT

## THE DISTRICT OF PUERTO RICO

MANGO LABS, LLC, a Wyoming limited liability company,

Plaintiff,

v.

JOHN KRAMER, an individual, MAXIMILIAN SCHNEIDER, an individual, and Does 1-10, et al.,

Defendants.

CIVIL ACTION NO.: 3:24-cv-01587-GMM

DECLARATION OF TYLER SHIPE IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANT JOHN KRAMER'S MOTION TO DISMISS

- I, Tyler Shipe, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America as follows:
- 1. I am one of the first contributors to Mango Markets, and I make this declaration in support of Plaintiff Mango Labs, LLC's ("Mango Labs") Opposition to Defendant John Kramer's Motion to Dismiss. Unless otherwise stated, I have personal knowledge of the facts set forth in this declaration and if asked to testify as to these facts, I would be competent to do so.
- 2. The Mango DAO and certain DAO members, including myself and Durairaj, voted to assign our claims against Kramer and Schneider to Mango Labs, which was consistent with how the DAO handled legal claims in the past (e.g., against Eisenberg). To my knowledge, the majority of votes against assignment consisted of votes by Defendants—votes made with their fraudulently obtained tokens.
- 3. I knowingly assigned my individual claims to Mango Labs by voting yes on the assignment proposal referenced in Exhibit 10 of Mr. Durairaj's declaration. If the Court has any

question regarding the validity and logistics of the assignment, I would be happy to execute another assignment.

4. I do not reside in Puerto Rico and am not a citizen of Puerto Rico. None of the assignors of claims to Mango Labs, as far as I know, are residents or citizens of Puerto Rico.

Executed on this 11th day of February, 2025, in Tokyo, Japan.

Respectfully submitted,

Tyler Ship